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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

COMMUNITY SCHOOL INITIATIVE, and
LEX TECNICA, LTD

Case No.: 23-CV-00069-APG-EJY

Plaintiffs,

VS.

VANGUARD FIELD STRATEGIES, LLC, and
AXIOM LLC.

Defendants.

**JOINT UNCONTESTED MOTION
FOR EXTENSION OF TIME TO
FILE PRETRIAL ORDER
[First Request]**

Plaintiff Lex Technica, LTD and Defendants Vanguard Field Strategies, LLC, and Axiom LLC (collectively the “Parties”) hereby move the Court for an order granting the Parties a 45-day extension of time in which to file their Joint Pretrial Order. In support of this request, the Parties state as follows:

1. On March 31, 2025, the Court set the deadline for the Parties to submit their Joint Pretrial Order as May 2, 2025. (Doc. 110).

2. Since that time, the Parties have begun work necessary to complete a Joint Pretrial Order, but the Parties agree that additional time is needed to properly complete this work.

3. As alluded to prior to and at the recent hearing before the Court, Defendants have been set back by medical issues their former lead trial counsel has been experiencing. Mr. Bodamer has been diagnosed with stage 4 cancer and fighting this condition has required Mr. Bodamer to take an extended leave of absence. Additionally, Mr. Bodamer's associate who was integral in representing Defendants since this case began recently left Graves Garrett Greim LLC for a different law firm. These events have led to a situation where Defendants effectively have new counsel that is attempting to quickly and effectively fill the void. While both parties agree the requested extension is mutually beneficial, Defendants wanted to provide the Court with this more detailed explanation of the current situation for context.

4. The Parties represent this extension is sought for good faith reasons and is not requested for purposes of undue delay.

5. The Parties agree that a 45-day extension of time is needed to allow them to properly complete and submit the detailed Joint Pretrial Order the Court expects the Parties to submit. Accordingly, the Parties move the Court for an Order extending the Parties' deadline to file a Joint Pretrial Order to Monday, June 16, 2025 (i.e., 45 days from the current deadline of May 2, 2025).

WHEREFORE, for the reasons explained above, the Parties jointly move the Court to enter an order extending the Parties' deadline to file a Joint Pretrial Order to Monday, June 16, 2025 (i.e., 45 days from the current deadline of May 2, 2025).

Dated: April 30, 2025

Jointly and respectfully submitted,

ASHCRAFT BARR LLP

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19 **ORDER**

20 IT IS SO ORDERED.

21 
22 U.S. MAGISTRATE JUDGE
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24 Date: April 30, 2025
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